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Attorney for **RODRIGUEZ-HERNANDEZ**

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

VICTOR MANUEL RODRIGUEZ-
HERNANDEZ,

Defendant.

2:13-cr-105-JCM-GWF

**UNOPPOSED MOTION TO ADVANCE
SENTENCING HEARING**

COMES NOW THE DEFENDANT, Victor Manuel Rodriguez-Hernandez, by and through counsel, Rene L. Valladares, Federal Public Defender, and RAQUEL LAZO, Assistant Federal Public Defender, counsel for VICTOR MANUEL RODRIGUEZ-HERNANDEZ, that the sentencing hearing currently scheduled for Thursday, August 22, 2013 at the hour of 10:00 a.m. be advanced to a date and time convenient to this court.

This Stipulation is entered into for the following reasons:

1. Defendant's Presentence Investigation Report has been completed. Probation has recommended a sentence of credit for time served. This is consistent with the parties sentencing agreement as delineated in the plea agreement.

2. The government has no opposition.

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1 DATED this 15th day of July, 2013.

2 Respectfully submitted,

3 RENE L. VALLADARES
4 Federal Public Defender

5 */s/ Raquel Lazo*

6 By: _____
7 RAQUEL LAZO,
8 Assistant Federal Public Defender
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

2:13-cr-105-JCM-GWF

Plaintiff,

**PROPOSED ORDER TO ADVANCE
SENTENCING HEARING**

vs.

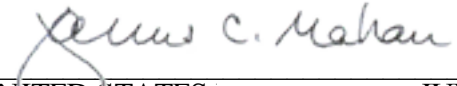
VICTOR MANUEL RODRIGUEZ-
HERNANDEZ,

Defendant.

ORDER

GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the sentencing hearing currently scheduled for Thursday, August 22, 2013 at the hour of 10:00 a.m. be advanced to July 30, 2013 at the hour of 10:30 a.m.

DATED 25 day of July, 2013.


UNITED STATES DISTRICT JUDGE

CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that I am an employee of the Law offices of the Federal Public Defender for the District of Nevada and am a person of such age and discretion as to be competent to serve papers.

That on July 15, 2013, she served an electronic copy of the above and foregoing **UNOPPOSED MOTION TO ADVANCE SENTENCING HEARING** by electronic service (ECF) to the person named below:

DANIEL BOGDEN
United States Attorney
333 Las Vegas Blvd. So., 5th Floor
Las Vegas, Nevada 89101
ROBERT A. BORK
Assistant United States Attorney
333 Las Vegas Blvd. So. 5th Floor
Las Vegas, NV 89101

/s/ Maribel Bran

Employee of the Federal Public Defender